

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

A.G., a minor child; D.A., a minor child;)
A.L., a minor child; M.K., a minor child;)
and M.H., a minor child;)
)
PLAINTIFFS,)
) CASE NO: 2:05-CV-1090-MEF
VS.)
)
AUTauga COUNTY BOARD OF)
EDUCATION, et al.,)
)
DEFENDANTS.)

B.H., a minor child, by and through his)
mother and next of friend, D.S.,)
)
PLAINTIFFS,)
)
VS.) CASE NO: 2:06-cv-0393-MEF
)
AUTauga COUNTY BOARD OF)
EDUCATION, et al.,)
)
DEFENDANTS.)

AUTauga COUNTY BOARD OF EDUCATION, JOSEPH L. BUTLER AND DENE
CLEVELAND'S OBJECTIONS TO PLAINTIFFS' SEVENTH REQUEST FOR
PRODUCTION

COME NOW Defendants Autauga County Board of Education, Joseph L. Butler and Dene Cleveland and object to plaintiffs' seventh request for production:

1. Defendants object on the grounds of *In Re: Ford Motor Co.*, F.3d 1315 (11th Cir. 2003). Defendants object to production request # 1 as it is unduly burdensome, harassment, in violation of the defendants' privacy rights, in violation of the privacy rights



of the students and employees of the Autauga County Board of Education, a violation of FERPA, seeks confidential information, irrelevant and not designed to lead to the discovery of relevant evidence. If the plaintiffs will refine their request to certain matters relevant to these cases, the defendants can respond.

2. Defendants object on the grounds of *In Re: Ford Motor Co.*, F.3d 1315 (11th Cir. 2003). Defendants object to production request # 2 as it is unduly burdensome, harassment, in violation of the defendants' privacy rights, in violation of the privacy rights of the students and employees of the Autauga County Board of Education, a violation of FERPA, seeks confidential information, irrelevant and not designed to lead to the discovery of relevant evidence. If the plaintiffs will refine their request to certain matters relevant to these cases, the defendants can respond.

3. Defendants object on the grounds of *In Re: Ford Motor Co.*, F.3d 1315 (11th Cir. 2003). Defendants object to production request # 3 as it is unduly burdensome, harassment, in violation of the defendants' privacy rights, in violation of the privacy rights of the students and employees of the Autauga County Board of Education, a violation of FERPA, seeks confidential information, irrelevant and not designed to lead to the discovery of relevant evidence. If the plaintiffs will refine their request to certain matters relevant to these cases, the defendants can respond.

4. Defendants object on the grounds of *In Re: Ford Motor Co.*, F.3d 1315 (11th Cir. 2003). Defendants object to production request # 4 as it is unduly burdensome, harassment, in violation of the defendants' privacy rights, in violation of the privacy rights

of the students and employees of the Autauga County Board of Education, a violation of FERPA, seeks confidential information, irrelevant and not designed to lead to the discovery of relevant evidence. If the plaintiffs will refine their request to certain matters relevant to these cases, the defendants can respond.

Katherine C. Hortberg

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CERTIFICATE OF SERVICE

I hereby certify that I have on this **8th** day of **November, 2006**, served a copy of the foregoing on counsel via facsimile and United States Mail properly addressed and first class postage prepaid, to wit:

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